

May 22, 2018

Marlene H. Dortch
Federal Communications Commission
445 12th Street SW
Room TWAA325
Washington, DC 20554

Re: Comment

ET Docket No.13-49. Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Ms. Dortch:

DENSO International America, Inc. is a Global Tier 1 Automotive System Supplier with over 15,500 employees in 32 facilities in 13 U.S. States. Our corporate focus and direction is to develop safety products for vehicles that help reduce and avoid crashes. This focus is intensifying as we see increases in fatal crashes globally. In the U.S. the United States Department of Transportation records show fatalities have increased last year to over 40,000 lives after a trend in decreasing fatalities in some of the previous years, in addition to an increasing trend in VRU (Vulnerable Road Users) incidents. One of the factors is the increase of impaired and distracted drivers.

Based on our history of developing and testing Dedicated Short Range Communications (DSRC) and its adoption in other countries we see DSRC as a currently available technology that can help reduce crashes and save lives. While other technologies might be available in the future, we should not delay taking action now to reduce property damage, personal injury, and save lives. Many safety and industry associations as well as a group of state departments of transportation have appealed to the US government for the preservation and accelerated utilization of DSRC in the 5.850-5.925 GHz band allocated to Intelligent Transportation Systems. This is vital for safety critical, lifesaving transportation applications on both passenger and commercial vehicles.

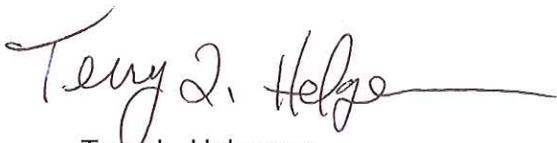
Every year across the nation there are multi-vehicle (30-50 vehicles) crashes, especially in the winter season, on U.S. interstate highways. Connected vehicle technologies based on DSRC has the potential benefits of increasing mobility efficiency, reducing crashes, and most importantly saving innocent lives. Combined with other Advanced Driver Assistance Systems (ADAS) such as cameras and radar, DSRC has the potential to improve driver safety and reduce vehicles crashes even more. DSRC also provides the US Trucking Industry with the ability to be more efficient and safe by increasing Truck Platooning, this is where a number of trucks can closely following one

another & increase fuel efficiency.

As the US population continues to grow our roads and highways will become more congested with drivers of all ages, many actions are being taken by State DOTs and the auto industry to make vehicles and our transportation system safer and more efficient. The actions by General Motors in adopting DSRC, the recent announcement by Toyota regarding adopting DSRC fleet-wide, along with the previously mentioned State DOT activity will help achieve everyone's goal of making our roads safer and reducing avoidable loss of the precious lives of our citizens and improvement of the efficiency of the transportation of goods and people in our economy.

DENSO International supports the continued allocation of the 5.850-5.925 GHz band to Intelligent Transportation Systems in North America. We support the research and development of other future technology that will help improve vehicle safety that will be technology backward compatible (a standard automotive industry practice). DSRC is available now and we should not inhibit its adoption while waiting for future technology to be validated which could take years, in turn, increasing the uncertainty of this strategically important frequency band.

Sincerely,



Terry L. Helgesen
DENSO International America, Inc.
Sr. Vice President Government Affairs
24777 Denso Drive
Southfield, Michigan 48086
Tel: (248) 372-8550